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Carlanda D. Meadors, et al.,)	
)	
Plaintiffs,)	
)	Case No. 21-cv-982-JLS
v.)	
)	
Erie County Board of Elections, et al.,)	
)	
Defendants.)	
)	
)	

Defendants Erie County Board of Elections, Jeremy J. Zellner, and Ralph M. Mohr move for summary judgment based on the following evidence and argument:

- The grounds for the motion are that Defendants are entitled to judgment as a matter of law based on the undisputed facts, including those facts subject to judicial notice, because the deadline for filing an independent nominating petition under New York law is permissible under the U.S. Constitution as applied to this case.

Defendants intend to file a reply memorandum of law at the appropriate time.

Dated: December 1, 2022

Respectfully submitted,

/s/ JEREMY TOTH

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